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LETTER AND U S NAVY RESPONSE TO THE RHODE ISLAND DEPARTMENT OF
ENVIRONMENTAL MANAGEMENT COMMENTS ON THE DRAFT REMEDIAL
INVESTIGATION REPORT FOR QDC OUTFALL 001 FORMER NCBC DAVISVILLE RI
03/03/2016
RESOLUTION CONSULTANTS

Resolution Consultants
A Joint Venture of AECOM & EnSafe
1500 Wells Fargo Building
440 Monticello Avenue
Norfolk, Virginia 23510

March 3, 2016

Rhode Island, Department of Environmental Management
Office of Waste Management
Attn: Mr. Richard Gottlieb
235 Promenade Street
Providence, RI 02908-5767

RE: Response to Comment on the Draft Remedial Investigation Report, QDC
Outfall 001 Remedial Investigation, Former NCBC Davisville, North
Kingstown, Rhode Island

Dear Mr. Gottlieb:

On behalf of the Naval Facilities Engineering Command (NAVFAC), Mid-Atlantic (MIDLANT), Resolution Consultants is submitting a Response to Comment for the Rhode Island Department of Environmental Management (RIDEM) comment on the Draft Remedial Investigation Report for QDC Outfall 001 Remedial Investigation dated August 7, 2015.

If you have any questions, please do not hesitate to contact the Navy RPM and/or myself.

Sincerely,



Resolution Consultants
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NCBC Davisville Task Order Manager
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Navy Responses To
Rhode Island Department Of Environmental Management
Comment Dated August 7, 2015

On QDC Outfall 001 Draft Remedial Investigation,
Former Naval Construction Battalion Center (NCBC) Davisville, North Kingstown,
Rhode Island

March 3, 2016

The RIDEM comment on the Navy's QDC Outfall 001 Draft Remedial Investigation (December 2014), is presented below. The RIDEM comment is presented first, followed by the Navy response (*italics*). The RIDEM response follows in underline, and the Navy's second response is presented last in bold.

RIDEM Specific Comment:

RIDEM Specific Comment 14. Figure 4-12, TPH Concentrations in Sediment – The following locations have exceedances of RIDEM GB Leachability Criteria of 2500 mg/kg: QF-SD06, 07, 08, 09, 10, 11, 13, 14, 15, 18, 19, 20 and 24 ranging from 2,730 to 15,000 mg/kg. The following locations have exceedances of RIDEM upper concentration limits of 30,000 mg/kg: QF-SD14, 19 and 20 ranging from 38,100 to 118,000 mg/kg. Irrespective of the results of the risk assessments, TPH contamination must be addressed.

Navy Response – The RIDEM GB Leachability Criteria are not applicable to sediment. TPH contamination will be addressed in the FS.

RIDEM Response – Navy is correct that RIDEM does not have leachability criteria specific to sediment. Some form of remedial action, however, must be performed for the high levels of THP in the sediment. Navy would have the option of developing leachability standards for sediment at this specific location, simply using the existing RIDEM leachability criteria, or removing the TPH. Based on previous discussions between Navy, USEPA and RIDEM it appears the Navy is electing to remove the TPH from the sediment which RIDEM finds to be acceptable.

Navy Response – As noted in the comment, the Navy has elected to perform a removal based on the RIDEM Method 1 Direct Exposure Criteria for TPH (i.e., 500 mg/Kg). This decision was agreed to by the BCT on October 28, 2015 as documented in the Draft Final Remedial Investigation Report.